

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

SK:DEL F. #2019R01327

271 Cadman Plaza East Brooklyn, New York 11201

January 15, 2020

## By ECF and Hand Delivery

Amanda David, Esq. Federal Defenders of New York One Pierrepont Plaza, 16th Floor Brooklyn, NY 11201

Re: United States v. Richard Palmer

Criminal Docket No. 19-556 (CBA)

Dear Ms. David:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides additional discovery with respect to the above-referenced matter on the enclosed CD. This disclosure supplements the government's earlier disclosures provided on December 19, 2019. The government renews its requests for reciprocal discovery from the defendant.

Please find the following on the enclosed CD:

• A spreadsheet containing emails sent by the defendant between October 6, 2016, and October 1, 2019, which also lists, among other things, the recipient, subject line, delivery date, and file name of attachments, if any (Batesnumbered PALMER000083); and

• Images of text message conversations between the defendant and John Doe between February 2019, and October 2019 (Bates-numbered PALMER000084–PALMER001302);

Very truly yours,

RICHARD P. DONOGHUE United States Attorney

By: /s/ Devon Lash

Devon Lash Assistant U.S. Attorney (718) 254-6014

## Enclosures

cc: Clerk of the Court (CBA) (by ECF) (without enclosures)